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EX PARTE

April 13, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

*Re: Section 272(f)(1) Sunset of the BOC Separate Affiliate and
Related Requirements, WC Docket No. 02-112*

Dear Ms. Dortch:

This letter supplements Verizon's March 27, 2007 Response¹ to specification 1 of the Commission's March 13 information request, following requests for clarification from Wireline Competition Bureau Staff,

Wireline Competition Bureau Staff had requested the disaggregation of certain data for Pennsylvania and Virginia by areas served by the former Bell Atlantic and the former GTE. Verizon's April 3 Submission² contained this disaggregation for legacy Verizon residential retail

¹ Response of Verizon to the Commission's March 13, 2007 Information Request ("Verizon's March 27 Response"), *attached to* Letter from Joseph Jackson, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 02-112 (Mar. 27, 2007).

² Letter from Joseph Jackson, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 02-112 (Apr. 3, 2007).

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lines³ and most data associated with presubscribed legacy Verizon residential lines.⁴ Verizon's April 5 Submission' contained an estimate for legacy Verizon residential retail lines that are presubscribed to Verizon Long Distance.'

The attached exhibits provide the former Bell Atlantic/former GTE disaggregation in Pennsylvania and Virginia for other data provided with Verizon's March 27 Response. Exhibit 1.B.1 contains the same data Verizon submitted in Exhibit 1.B (residential resale lines and the top three purchasers of residential resale lines), however, Exhibit 1.B.1 is limited to Pennsylvania and Virginia, and disaggregates volumes in these states by areas served by the former Bell Atlantic and the former GTE.

Exhibit 1.C.1 contains the same data Verizon submitted in Exhibit 1.C (unbundled loops and the top three purchasers of unbundled loops), however, Exhibit 1.C.1 is limited to Pennsylvania and Virginia, and disaggregates volumes in these states by areas served by the former Bell Atlantic and the former GTE. Exhibit 1.C included a worksheet labeled "UNE Loops – Top 3," which contained an error: the table heading incorrectly stated "DS-0 UNE LOOPS." It should have stated "UNE LOOPS," because the data were not limited to DS-0 loops.

Exhibit 1.D.1 contains the same data Verizon submitted in Exhibit 1.D (residential Wholesale Advantage lines and the top three purchasers of residential Wholesale Advantage lines), however, Exhibit 1.D.1 is limited to Pennsylvania and Virginia, and disaggregates volumes in these states by areas served by the former Bell Atlantic and the former GTE.

Verizon does not maintain data disaggregated by areas served by the former Bell Atlantic and the former GTE that correspond to statewide totals for each of the time periods that were provided in Exhibit 1.F.1 (residential E911 listings). The attached Exhibit 1.F.4 provides the percentage of total residential E911 listings for the former Bell Atlantic and former GTE areas in Pennsylvania and Virginia as of the end of December 2006. This percentage may provide a reasonable estimate for other time periods.

Exhibits 1.B.1, 1.C.1, 1.D.1, and 1.F.4 contain Highly Confidential Information and have been marked "HIGHLY CONFIDENTIAL INFORMATION - SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 02-112 BEFORE THE FEDERAL

³ See Exhibit 1.A.1.a

⁴ See Exhibits 1.A.2.a (legacy Verizon residential retail lines for which Verizon Long Distance is not the PIC), 1.A.3.a (legacy Verizon residential retail lines for which no PIC is identified), and Exhibit 2.A (wholesale residential lines that are presubscribed to Verizon Long Distance).

⁵ Letter from Joseph Jackson, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 02-112 (Apr. 5, 2007).

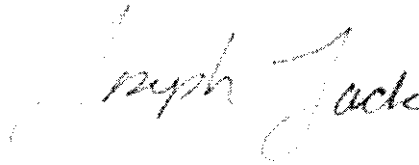
⁶ See Exhibit 1.A.1.b

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COMMUNICATIONS COMMISSION” in accordance with the Second Protective Order in this proceeding.’

If you have any questions, please call me at 202-515-2467.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Joseph Jack".

Enclosures

⁷ *Section 272(f)(1) Sunset of the ROC Separate Affiliate and Related Requirements, Second Protective Order, WC Docket No 02-112, DA 07-1389 (rel. Mar. 23, 2007).*

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EXHIBIT 1.B.1

REDACTED – FOR PUBLIC INSPECTION

EXHIBIT 1.C.1

REDACTED – FOR PUBLIC INSPECTION

EXHIBIT 1.D.1

REDACTED – FOR PUBLIC INSPECTION

EXHIBIT 1.F.4

ATTACHMENT 7

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EX PARTE

April 13, 2007

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

*Re: Section 272(f)(1) Sunset of the BOC Separate Affiliate and
Related Requirements, WC Docket No. 02-112*

Dear Ms. Dortch:

At a meeting with Verizon on March 29, 2007, Wireline Competition Bureau Staff asked several questions about the data provided in Verizon's March 27 Response.¹ The attached exhibit responds to staff's questions regarding Exhibit 2.

Specifically, Wireline Competition Bureau Staff asked whether the wholesale residential lines that are presubscribed to Verizon Long Distance are in fact served by the former MCI for local service. The attached Exhibit 2.B provides carrier detail for each state and time period contained in Exhibit 2. Consistent with the supplemental data provided in Exhibit 2.A on April 3, Exhibit 2.B includes volumes disaggregated by areas served by the former Bell Atlantic and the former GTE in Pennsylvania.² Data for Virginia are not available. The exhibit shows that

¹ Response of Verizon to the Commission's March 13, 2007 Information Request ("Verizon's March 27 Response"), *attached to* Letter from Joseph Jackson, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 02-112 (Mar. 27, 2007).

² See Letter from Joseph Jackson, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 02-112 (Apr. 3, 2007).

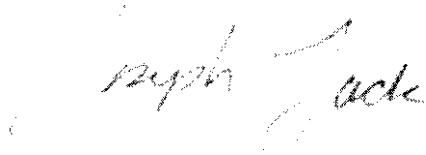
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carriers other than MCI provide local service for the majority of wholesale residential lines that are presubscribed to Verizon Long Distance.

Exhibit 2.B contains Highly Confidential Information and has been marked "HIGHLY CONFIDENTIAL INFORMATION - SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 02-1 12 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION" in accordance with the Second Protective Order in this proceeding.³

If you have any questions, please call me at 202-515-2467.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Ralph Jack", is written over a faint, circular, dotted background.

Enclosure

³ *Section 272(f)(1) Sunset of the ROC Separate Affiliate and Related Requirements*, Second Protective Order, WC Docket No. 02-1 12, DA 07-1389 (rel. Mar. 23, 2007).

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EXHIBIT 2.B

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ATTACHMENT 8

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April 13, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

*Re: Section 272(f)(1) Sunset & the BOC Separate Affiliate and
Related Requirements, WC Docket No. 02-112*

Dear Ms. Dortch:

On April 12, 2007, Verizon supplemented its March 27 response to the Commission's March 13 information request with data from Harte-Hanks, as requested by the Wireline Competition Bureau.¹

The attached Exhibit 4.4.A provides further analyses based on the Harte-Hanks data submitted as Exhibit 4.4. First, Exhibit 4.4.A contains Harte-Hanks data for T-1, T-3, Frame Relay, ATM, Long Distance, and VPN services, consolidated by MSA. (In the prior filing, MSAs that included areas from more than one state were split among those states.) Verizon added a "Region" column which designates each MSA as a former **Bell** Atlantic North ("fBA

¹ See Letter from Joseph Jackson, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 02-112 (filed Apr. 12, 2007).

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North”),’ former Bell Atlantic South (“fBA South),’ former GTE (“fGTE”),⁴ or non-Verizon (“Non-VZ”) MSA. Although an MSA may be designated as fBA North, fBA South, or fGTE, Verizon is not necessarily the only incumbent LEC in the MSA.

Second, Exhibit 4.4.A includes, for those MSAs for which there are fewer than 30 total observations for each relevant service, data that are aggregated by region.

Finally, Exhibit 4.4 included data for each state, provided separately for Verizon’s in-franchise service territory and out-of-franchise territory. These data for Washington, D.C. included a distinction between in-franchise and out-of-franchise territories because NPA-NXX codes were not available for some of the customer sites that are located in Washington, D.C. Because these customer sites are known to be located in Washington, D.C. and because Verizon serves Washington, D.C. in its entirety, Verizon has revised the relevant worksheets to consolidate the out-of-franchise data with in-franchise data. These revised worksheets are contained in Exhibit 4.4.A.

Exhibit 4.4.A contains Highly Confidential Information and has been marked “HIGHLY CONFIDENTIAL INFORMATION - SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 02-112 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION” in accordance with the Second Protective Order in this proceeding?

If you have any questions, please call me at 202-515-2467

Very truly yours,

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Enclosure

² fBA North states consist of New York, Connecticut, Massachusetts, Maine, New Hampshire, Rhode Island, and Vermont. For purposes of this analysis, the New York MSA was assigned to fBA North.

³ fBA South states consist of Delaware, Maryland, New Jersey, Pennsylvania, Virginia, West Virginia, and the District of Columbia.

⁴ An MSA that consists of areas served by both the former Bell Atlantic and the former GTE was designated as a former Bell Atlantic area.

⁵ *Section 272(f)(1) Sunset of the BOC Separate Affiliate and Related Requirements*, Second Protective Order, WC Docket No. 02-112, DA 07-1389 (rel. Mar. 23, 2007).

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EXHIBIT 4.4.A

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ATTACHMENT 9

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EX PARTE

April 17, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
335 12th Street, S.W.
Washington, DC 20554

*Re: Section 272(f)(1) Sunset of the BOC Separate Affiliate and
Related Requirements, WC Docket No. 02-112*

Dear Ms. Dortch:

This letter supplements Verizon's March 27, 2007 Response¹ to specification 1 of the Commission's March 13 information request, following requests for clarification from Wireline Competition Bureau Staff.

On April 13, Verizon submitted for certain data provided with Verizon's March 27 Response, volumes for Pennsylvania and Virginia disaggregated by areas served by the former Bell Atlantic and the former GTE.² The attached Exhibit 1.E.1 contains estimated residential DSL volumes for Pennsylvania and Virginia, disaggregated by areas served by the former Bell

¹ Response of Verizon to the Commission's March 13, 2007 Information Request ("Verizon's March 27 Response"), attached to Letter from Joseph Jackson, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 02-112 (Mar. 27, 2007).

² See Letter from Joseph Jackson, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 02-112 (Apr. 13, 2007) (attaching Exhibits 1.B.1, 1.C.1, 1.D.1, and 1.F.4).

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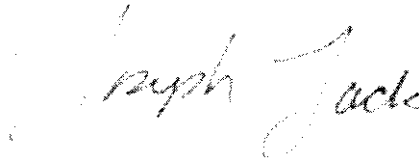
Atlantic and the former GTE, however, these disaggregated estimates are available only for December for 2003 through 2006, rather than by quarter for each year.

To calculate these estimates, Verizon relied on the proportion of DSL customers that were served in the former Bell Atlantic and former GTE service areas for each corresponding time period, based on data that are reported in a database separate from the one on which Verizon relied for purposes of Exhibit 1.E. Verizon applied these proportions to DSL volumes that were reported in Exhibit 1.E. Exhibit 1.E.1 also includes the proportion of customers for which Verizon does not also provide wireline local exchange service; while the percentage is an estimate, the denominator used in the calculation – the underlying number of lines for each service area – was obtained from Verizon's databases.

Exhibit 1.E.1 contains Highly Confidential Information and has been marked "HIGHLY CONFIDENTIAL INFORMATION - SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 02-112 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION" in accordance with the Second Protective Order in this proceeding.'

If you have any questions, please call me at 202-515-2467.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Joseph Jack".

Enclosure

³ Section 272(f)(1) Sunset of the BOC Separate Affiliate and Related Requirements, Second Protective Order, WC Docket No. 02-112, DA 07-1389 (rel. Mar. 23, 2007).

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EXHIBIT 1.E.1

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ATTACHMENT 10

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*Re: Section 272(f)(1) Sunset of the BOC Separate Affiliate and
Related Requirements, WC Docket No. 02-112*

Dear Ms. Dortch:

At a meeting with Verizon on March 29, 2007, Wireline Competition Bureau Staff asked several questions about the data provided in Verizon's March 27 Response.¹ The attached exhibit responds to staff's questions regarding specification 2.

Specifically, Wireline Competition Bureau Staff asked for additional data that would show the percentage of local lines served by the former MCI that are presubscribed to MCI for long-distance service. The attached Exhibit 2.1 identifies the presubscribed long-distance carriers for local residential lines served nationwide by the former MCI. These data are provided by state, for each quarter of 2004 through 2006. Exhibit 2.1 identifies the presubscribed carriers that are affiliated with the former MCI and with legacy Verizon separately from AT&T, Qwest, Sprint, and other carriers.² These data show that, for example, as of December 2005, prior to the

¹ Response of Verizon to the Commission's March 13, 2007 Information Request ("Verizon's March 27 Response"), *attached to* Letter from Joseph Jackson, Verizon, to Marlene H. Dortch, FCC, WC Docket No. 02-112 (Mar. 27, 2007).

² In Pennsylvania and Virginia, presubscribed lines in the former Bell Atlantic and former GTE service areas are displayed separately.

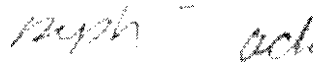
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Verizon/MCI merger, MCI was the presubscribed long-distance carrier to approximately [BEGIN HIGHLY CONFIDENTIAL] [END HIGHLY CONFIDENTIAL] percent of residential lines for which MCI was the local provider. In December 2006, MCI or Verizon was the presubscribed long-distance carrier to approximately [BEGIN HIGHLY CONFIDENTIAL] [END HIGHLY CONFIDENTIAL] percent of residential lines for which the fonner MCI was the local provider.

Exhibit 2.1 contains Highly Confidential Information and has been marked "HIGHLY CONFIDENTIAL INFORMATION - SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 02-1 12 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION" in accordance with the Second Protective Order in this proceeding.'

If you have any questions, please call me at 202-515-2467.

Very truly yours,



Enclosure

³ Section 272(f)(1) Sunset of the BOC Separate Affiliate and Related Requirements, Second Protective Order, WC Docket No. 02-1 12, DA 07-1389 (rel. Mar. 23, 2007).

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EXHIBIT 2.1

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ATTACHMENT 11

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EX PARTE

April 19, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

*Re: Section 272(f)(1) Sunset of the BOC Separate Affiliate and
Related Requirements, WC Docket No. 02-112*

Dear Ms. Dortch:

This letter supplements Verizon's March 27, 2007 response to specifications 4 and 5 of the Commission's March 13 information request.

The attached Exhibit 4.5 provides additional data from Harte-Hanks. Like the Harte-Hanks data that Verizon previously submitted, these additional data set forth the percentage of customer sites at which a carrier is a provider for the following product segments: T-1, T-3, Frame Relay, ATM, Long-Distance, and VPN. These data are presented for each of the 28 states in which Verizon provides local wireline telephone service plus the District of Columbia; within each individual state data are provided separately for Verizon's in-franchise service territory and out-of-franchise territory. These new data provide a more granular breakdown of business sites, dividing them into four categories: 0 to 4 site employees, 5 to 19 site employees, 20 to 249 site employees, and 250+ site employees.

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